

Albert M Spradling III

From: Samuel M. Wendt <sam@wendtlaw.com>
Sent: Tuesday, April 20, 2021 9:55 AM
To: Albert M Spradling III
Subject: RE: Sanders

I'm virtually certain they have telephones, internet, and email in whatever state you are going to.

Samuel (Sam) M. Wendt
Attorney



4717 Grand Avenue, Suite 130
Kansas City, Missouri 64112
Direct Line: (816) 988-2910
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Toll Free: (866) 539-4415
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From: Albert M Spradling III <albert@spradlaw3.com>
Sent: Tuesday, April 20, 2021 9:53 AM
To: Samuel M. Wendt <sam@wendtlaw.com>
Subject: RE: Sanders

I will be out of the state the 23rd to the 25th and may not have any information until then.

Albert M. Spradling, III
Spradling & Spradling
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573-335-8296 Fax: 573-335-8525

From: Samuel M. Wendt <sam@wendtlaw.com>
Sent: Tuesday, April 20, 2021 9:47 AM
To: Albert M Spradling III <albert@spradlaw3.com>
Subject: RE: Sanders

I understand the committee is meeting on April 23rd at 10:00AM. I will expect a response thereafter.

Samuel (Sam) M. Wendt
Attorney





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From: Albert M Spradling III <albert@spradlaw3.com>
Sent: Tuesday, April 20, 2021 9:25 AM
To: Samuel M. Wendt <sam@wendtlaw.com>
Subject: RE: Sanders

Sam,

While we can agree or disagree on the extent of liability on behalf of my clients, I recognize the potential of an adverse judgment and I am in the process of trying for an offer of settlement based on your latest demand for policy limits. As you are aware of MOPERM meets on a quarterly basis and reviews cases for any claim of damages in excess of \$100,000.00. MOPERM's committee is meeting at the end of April or 1st of May and I should have an answer by then. Your original offer of policy limits did not contain a cutoff date and in fact was an open ended time frame. As I previously discussed with you I cannot get authority from a claims representative until the Committee meets. I previously offered you \$650,00.00 and to increase that offer beyond the authority given me will require the AG and the MOPERM Committee providing me additional authority.

I should know something by May 15th.

Al

Albert M. Spradling, III
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From: Samuel M. Wendt <sam@wendtlaw.com>
Sent: Tuesday, April 20, 2021 9:09 AM

To: Albert M Spradling III <albert@spradlaw3.com>

Subject: Sanders

AI:

In reviewing the volumes of material obtained through discovery and your own investigation, I believe you will find that your clients' liability is clear and the resulting damages on account of Tory Sanders' death far exceed any available insurance coverage, exposing your clients to a significant excess judgment.

As such, we will be withdrawing the demand initially made on March 24, 2020 in the very near future. As a courtesy to your clients, I am providing you with this notice. Once the demand is withdrawn, it will not be revisited. I am also willing to speak to your clients' personal/individual counsel to discuss ways we can protect their personal assets outside of the available insurance coverage.

I look forward to hearing from you. Please feel free to call me with any questions or concerns.

Samuel (Sam) M. Wendt

Attorney



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